REMARKS

I. INTRODUCTION

In response to the Office Action dated November 28, 2007, claims 1, 3, 6, 11, 12 and 14 have been amended. Claims 1-14 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. PRIOR ART REJECTIONS

A. The Office Action Rejections

On pages (2)-(3) of the Office Action, claims 12 and 14 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,131,809 (Drescher). On pages (3)-(7) of the Office Action, claims 1-3, 6-8 and 13 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of U.S. Patent No. 6,484,380 (Graef) in view of U.S. Patent No. 6,029,971 (Lynch) and U.S. Patent No. 3,961,784 (Sevak). On pages (7)-(8) of the Office Action, claims 4-5 and 9-10 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of U.S. Patent No. 6,484,380 (Graef) in view of U.S. Patent No. 6,029,971 (Lynch), U.S. Patent No. 3,961,784 (Sevak) and U.S. Patent No. 6,131,809 (Drescher). On pages (8)-(9) of the Office Action, claim 11 was rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of U.S. Patent No. 6,484,380 (Graef) in view of U.S. Patent No. 6,029,971 (Lynch) and U.S. Patent No. 6,131,809 (Drescher).

Applicants' attorney respectfully traverses these rejections.

B. The Drescher Reference

Drescher describes an automated banking machine (10) that identifies and stores documents such as currency bills deposited by a user. The machine then selectively recovers documents from storage and dispenses them to other users. The machine includes a central transport (70) wherein documents deposited in a stack are unstacked, oriented and identified. Such documents are then routed to storage areas in recycling canisters (92, 94, 96, 98). When a user subsequently requests a dispense, documents stored in the storage areas are selectively picked therefrom and delivered to the user through an input/output area (50) of the machine. The control system (30) for the machine includes a terminal processor (548). The terminal processor communicates with a module processor (552). The module processor (552) communicates with

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module controllers (554, 556, 558, 560, 562 and 564) which control the operation of devices. The module processor coordinates the activities of the module controllers to achieve the processing of documents reliably and at high speeds. A special protocol is used to communicate messages between the module processors and module controllers which provides increased reliability.

C. The Graef Reference

Graef describes an automated banking machine (10) including sheet dispensing mechanisms (34, 36, 38, 40). Each sheet dispensing mechanism includes a picking member (72). The picking member rotates, with each rotation generally causing one sheet to be picked from a stack (42) of sheets. The picking member includes movable engaging portions supported on arcuate segments (128, 144). The engaging portions move radially outward to apply additional moving force to an end note bound in the stack responsive to movement of the picking member exceeding the movement of the end note. Sheets are carried in the machine by a transport (54) including a plurality of belt flights (174, 176, 178). Sheets are carried between the belt flights and projecting member portions (180, 182). At least one of the belt flights includes a plurality of longitudinally spaced projections (194, 200, 204, 207) on a sheet engaging surface thereof. The projections provide improved engagement with sheets moving in the transport enabling more reliable movement of sheets.

D. The Lynch Reference

Lynch describes a belt displacement operation periodically carried by the pick mechanism 11 of a sheet feeding apparatus, when the number of sheets fed has reaches a predetermined value. The motor 34 is driven in reverse for a predetermined time, so as to cause rotation of the belt 28 in the opposite direction to that during feeding. Since the pick pulley 26 is supported on the shaft 38 by means of a one-way clutch 40 so that it does not rotate during the reverse rotation of the belt 28, displacement of the belt 28 occurs relative to the pick pulley 26, so that in subsequent pick operations, a different portion of the belt 28 engages the stack 18 so as to pick a sheet, than had displacement of the belt 28 not occurred. This reduces the risk of localized portions of the belt 28 becoming more worn than others, due to more frequent engagement with the stack 18.

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E. The Sevak Reference

Sevak describes a document transport apparatus in a document reader sorter that is provided with a vacuum assisted friction feeder for picking documents one at a time from a document hopper and for advancing the documents at high speed along a document transport guideway to the control of a transport burst roller, the picking of the documents from the hopper by an apertured friction feed belt being assisted and facilitated by a low pressure vacuum directed upon a linearly disposed section thereof adjacent the hopper, and the high speed advancement of the documents into and along the document guideway to the control of the transport burst roller being assisted and facilitated by a high pressure vacuum directed upon a curvilinear section of the apertured belt cooperably disposed relative to the apertured circumference of a drive pulley, said high pressure vacuum being effective to lock the picked documents and particularly the leading edges thereof to the feed belt for an accelerated feeding thereof, said accelerated feeding of the documents into the document transport guideway in combination with the accelerated transmission of the documents therein by the transport burst roller resulting in maximized document throughput for the document reader sorter.

F. The Applicants' Invention is Patentable Over the References

1. The rejection of claims 12 and 14 under 35 U.S.C. §102(e) as being anticipated by Drescher

The Office Action states that Applicants' claims 12 and 14 are anticipated by Drescher.

Applicants' attorney disagrees. The Office Action's assertions essentially ignore the limitations found in Applicants' independent claims 12 and 14.

Drescher shows separate storage areas within a canister, but these are not separate media containers within a media module, as recited in Applicants' claims. Specially, each of the storage areas of Drescher does not have a lower face adjacent an associated separate pick mechanism, as recited in Applicants' claims. Indeed, all of the storage areas of Drescher share a single common canister delivery transport, which is placed above the storage areas, and none have their own pick mechanism.

Thus, Applicants' attorney submits that independent claims 12 and 14 are allowable over Drescher. Further, dependent claim 13 is submitted to be allowable over Drescher in the same

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manner, because it is dependent on independent claim 12, and thus contains all the limitations of independent claim 12. In addition, dependent claim 13 recites additional novel elements not shown by Drescher.

2. The rejection of claims 1-3, 6-8 and 13 under 35 U.S.C. §103(a) as being obvious in view of the combination of Graef, Lynch and Sevak

The Office Action admits Graef does not teach the elements of claims 1 and 6 directed to at least one module being associated with a vacuum pick mechanism. However, the Office Action, states that Lynch teaches that sheet feeding apparatus "are commonly of either the vacuum pick or friction pick type." Moreover, the Office Action cites Sevak as teaching a vacuum pick and a friction pick within the same unit. Thus, the Office Action asserts that it would have been obvious to include the teachings of Lynch and Sevak to the disclosure of Graef so that an ATM containing multiple media types can distribute the different types of media types in the most efficient and practical way possible.

Applicants' attorney disagrees. The Office Action's assertions essentially ignore the limitations found in Applicants' independent claims 1 and 6.

Instead, Graef describes an automated banking machine where each sheet dispensing mechanism includes a friction picking member. Lynch teaches that an automated teller machine (ATM) will have either a vacuum type sheet feeding apparatus or a friction type sheet feeding apparatus, but not both types of mechanisms. Sevak merely describes a single type of type of pick mechanism, namely a friction type pick with a vacuum assist, but not separate friction and vacuum type pick mechanisms used within the same self-service machine.

Specifically, the combination of Graef, Lynch and Sevak does not teach or suggest a self-service terminal having a plurality of separate media modules, wherein each media module is operatively associated with a separate pick mechanism, such that at least a first one of the media modules is associated with a separate vacuum pick mechanism, and at least a second one of the media modules is associated with a separate friction pick mechanism.

Consequently, the combination of Graef, Lynch and Sevak teaches away from Applicants' claims 1 and 6.

Thus, Applicants' attorney submits that independent claims 1 and 6 are allowable over Graef in view of Lynch and Sevak. Further, dependent claims 2-5 and 7-10 are submitted to be

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allowable over Graef in view of Lynch and Sevak in the same manner, because they are dependent on independent claims 1, and 6, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-5 and 7-10 recite additional novel elements not shown by Graef in view of Lynch and Sevak.

3. The rejection of claims 4-5 and 9-10 under 35 U.S.C. §103(a) as being obvious in view of the combination of Graef, Lynch, Sevak and Drescher

Dependent claims 4-5 and 9-10 are submitted to be allowable over Graef and Lynch in the same manner as independent claims 1, and 6, respectively, because of their dependency. In addition, dependent claims 4-5 and 9-10 recite additional novel elements not shown by Graef in view of Lynch.

4. The rejection of claim 11 under 35 U.S.C. §103(a) as being obvious in view of the combination of Graef, Lynch and Drescher

The Office Action states that Applicants' claim 11 is rendered obvious by the combination of Graef, Lynch and Drescher.

Applicants' attorney disagrees. The Office Action's assertions essentially ignore the limitations found in Applicants' independent claim 11.

Instead, Graef describes an automated banking machine with canisters, but the canisters do not have a plurality of media containers, and there is only a single pick mechanism for each canister in Graef, but not a plurality of pick mechanisms, one for each media container within the media module, as recited in Applicants' claims. Similarly, Lynch teaches a cassette, but without a plurality of media containers, and there is only a single pick mechanism for the cassette in Lynch, but not a plurality of pick mechanisms for each media container within the media module, as recited in Applicants' claims. Finally, Drescher shows separate storage areas within a canister, but not separate media containers, and Drescher has only a single common canister delivery transport for the canister, but not a plurality of pick mechanisms for each media container within the media module, as recited in Applicants' claims.

Thus, the combination of Graef, Lynch and Drescher does not teach or suggest a self-service terminal comprising means defining a media dispense path; and a plurality of separate and removable media modules, at least one of the separate and removable media modules

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including a plurality of separate media containers, each media container having a lower face and each media container having a separate friction pick mechanism adjacent the media container's lower face for picking media from the media container and transferring the picked media to the media dispense path.

III. CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited.

Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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